



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

July 3, 2025

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BY ECF

The Honorable Gregory H. Woods
United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

MEMORANDUM ENDORSED

Re: *Environmental Defense Fund v. United States Environmental
Protection Agency*, No. 25 Civ. 3565 (GHW)

Dear Judge Woods:

This Office represents defendant United States Environmental Protection Agency (“EPA”) in the above-referenced action brought pursuant to the Freedom of Information Act (“FOIA”). I write respectfully to request that the Government’s July 7, 2025, deadline to answer or otherwise respond to the plaintiff’s complaint be extended by one month, until August 7, 2025. As the Court may recall, EPA made a final production of records in response to the FOIA requests at issue on June 4, 2025. Since then, the plaintiff has conducted an initial review of the documents and requested additional information about EPA’s search and production. EPA has responded to those questions, and the plaintiff is reviewing those responses. The extension sought will allow the parties additional time to work collaboratively to discuss the EPA’s production and address any potential disputes. This is the Government’s third request for an extension of time to answer.

Should the Court grant the Government’s request, the Government respectfully further requests that the initial pretrial conference scheduled for July 24, 2025, be correspondingly adjourned to August 25, 2025, and that the July 17, 2025, deadline to submit a joint status letter and proposed case management plan be extended until August 18, 2025.

Counsel for the plaintiff consents to these requests.

Application granted in part. The Government’s request for adjournments of the deadline for it to respond to the complaint and of the initial pretrial conference in this case, Dkt. No. 15, is granted in part. The deadline for the Government to answer or otherwise respond to the complaint is extended to August 7, 2025. The initial pretrial conference scheduled for July 24, 2025 is adjourned to September 16, 2025 at 2:00 p.m. The deadline for the parties to submit the joint status letter and proposed case management described in the Court’s April 30, 2025 order is extended to September 9, 2025. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 15.

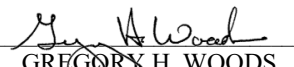
Respectfully,

JAY CLAYTON
United States Attorney

by: s/Mónica P. Folch
MÓNICA P. FOLCH
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SO ORDERED.

Dated: July 3, 2025


GREGORY H. WOODS
United States District Judge